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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**JOINT STIPULATION TO
BIFURCATE TRIAL PURSUANT
TO FED. R. CIV. P. 42(b)**

SHERR-UNA BOOKER, an individual,

(Assigned to the Honorable David G.
Campbell)

Plaintiff,

v.

C. R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, INC., an Arizona
corporation,

Defendants.

1 Plaintiff Sherr-Una Booker (“plaintiff”) and Defendants C. R. Bard, Inc. and Bard
 2 Peripheral Vascular, Inc. (collectively “Bard”) hereby stipulate and agree that, pursuant to
 3 Fed. R. Civ. P. 42(b) and to avoid prejudice, the trial of this case should be conducted in
 4 two phases: determining liability, compensatory damages, and whether punitive damages
 5 should be awarded in the first phase of trial and, if necessary, determining the amount of
 6 punitive damages in the second phase following the procedures set out in Georgia’s state
 7 statute on punitive damages – O.C.G.A. § 51-12-5.1(d).

8 RESPECTFULLY SUBMITTED this 7th day of February, 2018.

9 /s/ Richard B. North, Jr.
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22 **Attorneys for Defendants C. R. Bard,
 Inc. and Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

/s/ Richard B. North, Jr.
Richard B. North, Jr.

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